

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION, DAYTON, OHIO**

IN RE: BRUCE E. SPENCER) CASE NO. 11-30118
CHRISTIE A. SPENCER)
)
Debtors) JUDGE HUMPHREY
) CHAPTER 7

NOTICE OF MOTION/OBJECTION

Creditors Bailey Broadbent, Nicholas Berger, Melanie Berger, Lee Ann Scheonrock, and Joseph Tritol have filed papers with the court to obtain relief sought in an Amended Motion to Lift Automatic Stay Pursuant 11 U.S.C. sec. 362(d) to Allow Claimants to Proceed to Liquidate their Insurance Claims Against the Debtors to the Extent of the Debtor's Insurance.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the motion/objection, then on or before **twenty-one (21) days from the date set forth in the certificate of service for the motion/objection**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to Office of the Clerk, U.S. District Court, Federal Building, Room 712, 200 West Second Street, Dayton, Ohio 45402, OR your attorney must file a response using the court's ECF System.

The court must **receive** your response on or before the above date.

You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. mail to:

RICHARD M. GARNER (0061734)
BEVERLY A. ADAMS (0074958)
DAVIS & YOUNG
600 Superior Ave., East, #1200
Cleveland, OH 44114

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion/objection and may enter an order granting that relief without further hearing or notice.

Respectfully submitted,

/s/ Richard M. Garner
RICHARD M. GARNER (0061734)
Email: rgarner@davisyoung.com
BEVERLY A. ADAMS (0074958)
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1200 Fifth Third Center
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Cleveland, OH 44114
Phone: (216) 348-1700; Fax: (216) 621-0602
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of June 2011, a copy of the foregoing *Amended Motion to Lift Automatic Stay Pursuant 11 U.S.C. sec. 362(d) to Allow Claimants to Proceed to Liquidate their Insurance Claims Against the Debtors to the Extent of the Debtor's Insurance* and the Notice of Motion/Objection were served on the following registered ECF participants, **electronically** through the court's ECF System at the email address registered with the court:

David M. Martin
davidmartin@erinet.com

John G. Jansing
jjansing@hedrickjordan.com

Asst US Trustee (Day)
USTPRegion09.CB.ECF@usdoj.gov

Elizabeth Alphin
loubknotices@mapother-atty.com

Gilbert B Weisman
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Alan F. Berliner
Andrew Turscak, Jr.
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Alan.Berliner@thompsonhine.com
Andrew.Turscak@thompsonhine.com
Michael.Dillard@thompsonhine.com

Patti H. Bass
ecf@bass-associates.com

and on the following by **ordinary U.S. Mail** addressed to:

Bruce E. Spencer
435 Wildwood Drive
Springfield, OH 45504
Debtor

Christie A. Spencer
435 Wildwood Drive
Springfield, OH 45504
Debtor

Dennis A Lieberman, Special Counsel to the
Attorney General for Ohio Department of Taxation
Attn: Candi S. Rambo, Co-Counsel
15 W. Fourth Street, Suite 100
Dayton, Ohio 45402

/s/ Richard M. Garner

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